

Comments on East Hoathly with Halland Neighbourhood Plan Character Assessment- Regulation 14 (14th March 2023)

General Comments

The Council is aware of how much time and effort has gone into producing the Character Assessment, as well as producing all the maps and photographs. We offer the following comments with a view to improving the effectiveness and usability of the document.

Relationship between the Character Assessment and the Design Policy.

A character assessment can and should be used to support the policies in the neighbourhood plan. The Planning Aid Guide [here](#) explains in Part 5 the different ways it can be used. As the guide states, the Character Assessment can be used by developers to help them understand the local character and design and enable them to progress sensitively designed proposals, in keeping with the local area.

In effect the Character Assessment can be used as the evidence behind your design policy, however the wording of the design policy is critical. At the moment within your design policy you have stated that *'New developments should seek to conform with the best examples of Layout and Construction reflected in the East Hoathly with Halland Character Area Assessment'* however you do not define these and within the character assessment you have not listed what contributes to the positive character of each area, only the negative elements.

As well as listing the detractors for each character area and outlining what negative trends need addressing/ what should be avoided, you could add a section on the positive features of each area, establishing what it is you are wanting to reinforce. This would allow it to be used to better support the design policy. The wording of the policy could then be changed to more tightly cross-refer to the Character Assessment e.g. by supporting development that maintains or enhances the character of the area, having regard to the character assessment, or something similar.

You could also consider adding another section after the summary of the negative (and positive?) features at the end of the assessment with recommendations that have stemmed from the Character Assessment. This would then allow you to make reference to the recommendations in the Character Assessment within the policy. For example, the Hailsham Character Assessment has a set of recommendations at the end which are then referred to in the design policies.

Examples you could look at:

- [The Ascot, Sunninghill and Sunningdale Neighbourhood Plan](#) design policies state that development proposals should use the townscape assessment to inform the design approach.
- [Hailsham Character Appraisal](#) This includes positives and negatives and a set of recommendations at the end

- [Woldingham Character Assessment](#)- sections on historic development and landscapes, description of character areas. Identifies threats to the character of the area and opportunities.

Contents Page

The provision of a contents page would be useful for ease of reference.

Criteria affecting all Character Areas

There is quite a lot of duplication in this chapter from the main plan document. The following sections are largely repeated in the main plan document:

- Landscape Character and Topography,
- Woodlands, Trees and Hedgerows
- Dark skies
- Garages
- Pelham Buckle Milepost Markers
- Fingerpost Signs and letterboxes

Do you need these sections in both documents? We suggest that the neighbourhood plan could be refined and shortened, focusing on the key outputs and you could refer to the Character Assessment for further detail.

Annexe

The annexes can also be found in the main plan document. Do you need them in both? Again we suggest that they should only be in one document to avoid duplication and this would provide a more refined plan. You can of course refer to the character assessment in the plan.

Letterbox vs postbox.

You have changed most of the references in the Assessment from postbox to letterbox. However, postbox is the more common terminology. We recommend for you to update this.

Detailed Comments

Paragraph	Comment	Suggested change
	INTRODUCTION	
	There is a need to add an explanation of what a Character Assessment is, what it can and can't do.	Add an explanation of what a Character Assessment is i.e. a factual analysis....
	After the introduction you could add a section on the historic development of the parish, which will have influenced the character.	Add section on historic development. Character is social, historical and physical

	See the Salehurst and Robertsbridge example here	and the interplay between these factors.
	CHARACTER AREAS	
5	We would suggest that 15 character areas is a substantial number for a parish of this size. Noted this is not a landscape character assessment, but could this number be reduced? For example, the character areas 12, 13 and 14 relate to post 2000s development, could this be amalgamated?	Reduce the number of Character Areas.
10	We have had an updated landscape character assessment should this not be used as up-to-date evidence?	
11	See comments made in relation to this as per the neighbourhood plan and amend. In the absence of a Green Infrastructure strategy focus on the assets rather than saying that part of the strategic network.	
17	Have all of these points been taken over into the plan?	
19	The reference to the network is incorrect, the green / blue assets maybe but the parish is not identified as the green network per se. this is misleading.	Re-phrase
	CRITERIA AFFECTING ALL CHARACTER AREAS	
20	We are not sure this necessarily deals with the character issues specifically here and was noted within the NP in any case.	We would suggest removing this instead of repeating. Or remove from the plan and refer to it here.
34b	'Increase in housing density adversely changing the rural nature of the settlements'.	Rephrase

	Noted, but we are required to consider making the best use of land through the NPPF so perhaps rephrase?	
34e	<p>'Ineffective Sewage Infrastructure'</p> <p>Not sure this relates to character specifically, more of an environmental concern?</p>	Consider removing
	CHARACTER ASSESSMENT	
35	Perhaps here you could explain a bit more about the different criteria used, how the assessment was carried out, when, by whom etc?	Add methodology
Character Area 1	There are some buildings within the character area therefore you could have a Buildings Section.	Add Buildings Section
44	Would these heritage assets not fit better within a Heritage Section?	Add Heritage Section
Character Area 2	The Listed Buildings and potential non-designated heritage assets would fit better within a heritage section.	Add Heritage Section
	Add a buildings section for this Character Area	Add Buildings Section
57	See the comments on the main plan document regarding this. Do you mean non-designated heritage assets? The Neighbourhood Plan could identify buildings and structures including the milestones as non-designated heritage assets but it would need to be done at the Reg 14 stage.	Needs clarification
Character Area 3	Add a buildings section	Add a Buildings Section
65 and 66	The Listed Buildings and potential non-designated heritage assets would fit better within a heritage section.	Add Heritage Section

	View 11 seems very limited here and we are not sure it is needed.	Remove view 11
Character Area 4	Add detail of Listed Buildings to a Heritage Section. Some of the detail in the Buildings Section could also be moved to a Heritage Section.	Add a Heritage Section
72	<p>'There are four small cul-de-sac developments on the B2192 built as infill or on the site of a previous home'</p> <p>There are only two cul-de-sacs that are not linear along this road that I can think of and this is Old Heath Close and Wenham Gardens, maybe identify these if there are four?</p>	Amend number of cul de sacs or identify the four.
83b	<p>'Many of these properties are of historic interest and may have the potential to be non-designated heritage assets'.</p> <p>This will be dependent on a number of factors, including changes to the property (i.e. extensions, alterations and other issues). Perhaps just state that these properties may be of historic interest.</p>	Re-phrase
90	<p>Earlier on you mention the noise, smell and disturbance of the main road, are these not detractors? What about lighting? Are there any issues with the use of close boarded fencing, bin storage, adverts, parking?</p>	Consider other detractors
Character Area 5- Conservation Area 92a	Noted, but the part of the CA east of the Waldron Road and Hollow Lane is very low density, whilst the High Street is denser. Perhaps worth making this clear.	Needs clarification

92b	<p>'The heritage street lamps should be on a timer and not illuminated from midnight to 5 am'.</p> <p>It is not clear here if you are talking about whether the lamps are already on a timer or if this is a recommendation. The Character Appraisal should be limited to factual description.</p>	Needs clarification
c	<p>'The former Foresters Pub sign has been removed and should be replaced'.</p> <p>Again, this should be limited to factual description.</p>	Remove the second part of the sentence.
i	<p>'The Doctors Surgery and car park were added to the Conservation Area in 2017 but are not mentioned in the 2021 Character Appraisal. The reason for its inclusion in the Conservation Area remains unclear'.</p> <p>The reasons for adding this area in to the Conservation Area can be found in the Issues, Options and Recommendations document here</p>	
93	<p>You are missing one of the guiding principles in the Appraisal: Preserve and enhance views into and out of the conservation area.</p>	Add guiding principle
95c	<p>'Erosion of the rural setting for the settlement'.</p> <p>Noted, but the CA is the Core area of the village and not necessarily the periphery apart from the northern boundary.</p>	
e	<p>'Reduction in Biodiversity by the isolation of habitats and removal of foraging areas and transit routes'</p>	Consider removing

	Given the geographical coverage, is this accurate to state? It is largely built-up.	
g	'Inappropriate Garages that are too small and not used for Vehicles' Again, is this a character issue?	
	Are there other issues e.g. paving over of front gardens, bin storage?	Consider adding other detractors
Character Area 6-99	This car park is primarily intended for the users for the School, Village Hall and Church. It is a public carpark therefore is this true to state?	
106	Window sizes are good.	Window sizes are good -large
114	We are not sure this is necessarily required as part of the character assessment and if there are issues to raise on this, then you can e-mail our property surveyors at coporate.assets@wealden.gov.uk	Remove everything except first sentence. The Appraisal should be restricted to a factual description.
115a	In what sense are they inappropriate? Is it because they do not use local materials?	Explanation needed
c	'Inadequate parking for residents and visitors'. Given there are 20 public parking spaces here, we are not sure this is quite right. Perhaps the latter point is all that is needed (i.e. on road parking is congested).	Rephrase
e	Although higher than other areas clearly, we are not sure this is wildly out with other residential development of this period in the area (i.e. post 50s development as is highlighted below).	

Character Area 7 117	<p>'There are three blocks of flat roofed garaging and unmarked on-street parking spaces'.</p> <p>From the map it looks like there are more.</p>	<p>There are three four blocks of flat roofed garaging and a few houses have their own garages within their curtilage. and unmarked on-street parking spaces.</p>
	'There is also on-street parking outside the designated spaces'.	There is some on street parking and parking in front of the garages.
126	2 storey house	2 two storey house
130	<p>There are no trees within the area.</p> <p>There are trees in the photos? Maybe used the term 'limited trees within the development'.</p>	Re phrase
132a	In what sense are they inappropriate? Is it because they do not use local materials?	Explanation needed
c	<p>'Inadequate parking for residents and visitors'.</p> <p>This is covered in the point below. It may be the reason for d but is not necessarily an actual detractor.</p>	Remove or merge with d
e	<p>'Density not reflecting existing settlement'.</p> <p>Again for this type and age of development, this is a similar density to other types of development in the village.</p>	
g	<p>'Inappropriate Garages that are too small and not used for vehicles'</p> <p>Again, this may be a reason behind d but is not necessarily a detractor by itself.</p>	

	Consider if there are other detractors e.g. garages are poorly maintained, large expanse of concrete, car dominated landscape etc.	Consider other detractors
Character Area 8	Given this is only 5 dwellings total, is this really of sufficient scale to have its own character area?	Consider merging with one of the other Character Areas
143a	<p>'Inappropriate choice of materials and finishes.'</p> <p>In what sense are they inappropriate? Is it because they do not use local materials?</p>	Explanation needed
c	<p>'Inadequate parking for residents and visitors'.</p> <p>This is covered in the point below. It may be the reason for d but is not necessarily an actual detractor.</p>	Remove or merge with d
e	<p>'Density not reflecting existing settlement'.</p> <p>Again for this type and age of development, this is a similar density to other types of development in the village.</p>	
g	<p>'Inappropriate Garages that are too small and not used for vehicles'</p> <p>Again, this may be a reason behind d but is not necessarily a detractor by itself.</p>	
Character Area 9 153	<p>'There are no communal spaces, green spaces or trees.'</p> <p>Is this wholly accurate? Is it better to say limited.</p>	Re-phrase
154	'The heritage street lamp on London Road uses a low intensity bulb, which limits its light emission. This is a good feature, but the lamp	Remove second sentence

	<p>should also be on a timer and not illuminated from midnight to 5 am.'</p> <p>This should be limited to a factual description rather than making recommendations.</p>	
175a	<p>'Inappropriate choice of materials and finishes.'</p> <p>In what sense are they inappropriate? Is it because they do not use local materials?</p>	Explanation needed
c	<p>'Inadequate parking for residents and visitors'.</p> <p>This is covered in the point below. It may be the reason for d but is not necessarily an actual detractor.</p>	Remove or merge with d
e	<p>'Density not reflecting existing settlement'.</p> <p>Again for this type and age of development, this is a similar density to other types of development in the village.</p>	
h	<p>'Inappropriate Garages that are too small and not used for vehicles'</p> <p>Again, this may be a reason behind d but is not necessarily a detractor by itself.</p>	
	Are there other detractors here e.g. lack of footpaths, bin storage, large expanses of tarmac etc?	
Character Area 10 176	<p>'with properties spreading along the lanes leading out of an emerging village'.</p> <p>Not sure what is meant by this. Do you mean the main village?</p>	Needs clarification
178	'The orientation is all North facing with the houses set back around 20 metres from the Lane'	This is not wholly accurate. Add further description.

	<p>This appears mixed from the views we have and looking at aerial photography, this does vary nearer the entrance to Waldron Road, so perhaps go through this in the text.</p>	
187	<p>'There are no communal spaces, green spaces or trees'.</p> <p>The road is tree lined though or is that incorrect?</p>	Rephrase
209	<p>'It should be on a timer and not illuminated from midnight to 5 am'.</p> <p>The Character appraisal should be an assessment of character.</p>	Rephrase
211b	<p>'Inappropriate choice of materials and finishes.'</p> <p>In what sense are they inappropriate? Is it because they do not use local materials?</p>	Explanation needed
Character Area 11 220	<p>'that should be considered for non-designated heritage asset status.'</p> <p>We are not sure the wording is quite right here and would suggest that they are of historic interest instead. At the moment you are not proposing to create a local list as part of your neighbourhood plan.</p> <p>Would this paragraph not fit better within a Heritage Section?</p>	
223 b	<p>'Inappropriate choice of materials and finishes.'</p> <p>In what sense are they inappropriate? Is it because they do not use local materials?</p>	Explanation needed
Character Area 12 231	<p>'Window sizes are good'.</p>	Window sizes are good generous

233	<p>'There are no communal spaces, green spaces or trees'.</p> <p>Trees are visible in quite a lot of the photos.</p>	Rephrase
a	<p>'Inappropriate choice of materials and finishes.'</p> <p>In what sense are they inappropriate? Is it because they do not use local materials?</p>	Explanation needed
c	<p>'Inadequate parking for residents and visitors'.</p> <p>This is covered in the point below. It may be the reason for d but is not necessarily an actual detractor.</p>	Remove or merge with d
e	<p>Density not reflecting existing settlement.</p> <p>For the type and age of development, this seems a similar density to other types of development in the area?</p>	
g	<p>'Inappropriate Garages that are too small and not used for vehicles'</p> <p>Again, this may be a reason behind d but is not necessarily a detractor by itself.</p>	
Character Area 13 235	<p>'This new building and car park was included in the amended Conservation Area in 2017.It remains unclear why this happened'.</p> <p>We think that the last sentence here should be removed and again kept factual. Of course, it may be that the Council relooks at this again given the new development brought forward and seeks to amend this, but this will be a decision for officers and members of the District Council.</p>	See Issues and Options doc.

239	This would include business uses however, so this density would actually be higher for the residential element.	
243	Although a cul-de-sac, for vehicles	Although a cul-de-sac for vehicles,
251	<p>'consideration should be given to controlling it with a timer so that it is not illuminated from midnight to 5 am'</p> <p>This does not relate to an appraisal of character.</p>	Remove this part of sentence
252 a	<p>'Inappropriate choice of materials and finishes.'</p> <p>In what sense are they inappropriate? Is it because they do not use local materials?</p>	Explanation needed
c	<p>'Inadequate parking for residents and visitors'.</p> <p>This is covered in the point below. It may be the reason for d but is not necessarily an actual detractor.</p>	Remove or merge with d.
e	<p>Density not reflecting existing settlement.</p> <p>Again, this is comparable with other developments in the area?</p>	
h	<p>'Inappropriate Garages that are too small and not used for vehicles'</p> <p>Again, this may be a reason behind d but is not necessarily a detractor by itself. Also, is this genuinely the case here?</p>	
i	<p>'Loss of traditional boundary treatments'</p> <p>What do you mean by this? How is this a detractor?</p>	Needs further explanation.

	Are there other detractors e.g. lack of connectivity, lack of pavements?	
Character Area 14 a	<p>'Inappropriate choice of materials and finishes'</p> <p>How are they inappropriate?</p>	Needs explanation
c	<p>'Inadequate parking for visitors'</p> <p>This is covered in the point below. It may be the reason for d but is not necessarily an actual detractor.</p>	Remove or merge with d
e	<p>'Density not reflecting existing settlement'.</p> <p>This is again comparable to other developments in the area?</p>	
g	<p>'Inappropriate Garages that are too small and not used for vehicles'</p> <p>Again, this may be a reason behind d but is not necessarily a detractor by itself. Also, is this genuinely the case here? There is no mention of garage sizes in the appraisal.</p>	
Character Area 15 Amenity Areas	It would make more sense to have the list of detractors at the end of the Character Area as you have done in the other sections.	Move list of detractors to end
271	<p>'Parish Council is considering applying to get it designated as a Heritage Asset (See paragraph 28 for description)'.</p> <p>See previous comments on this subject.</p>	
272	<p>'The Pavilion has been proposed for application to list as an Asset of Community Value with WDC.'</p> <p>This currently does not make sense.</p>	Re phrase

Summary and Recommendations	'Many of the housing developments in the Parish are cul-de-sacs'	Need to be more specific on the differences between Halland and East Hoathly
279a	Do you mean East Hoathly? Not sure that this is true for Halland? It's almost entirely linear. Noted that this is more true of East Hoathly.	
c	<p>If you take out part of the Conservation Area to the north, this would increase the density of the village. There are other comments on this above. Almost all the character areas identified are over 20 dph, with some over 30 dph.</p> <p>Densities do not necessarily need to reflect the average density of a location and you can and should seek to increase density in certain circumstances (see NPPF Chapter 11).</p>	
e	Can you provide examples?	This requires further explanation.
m	There is no right to a view from owners' properties, albeit that landscape views are considered in terms of new development. Views onto open countryside is not necessarily a barrier to new development in itself and this should be reworded to ensure that only significant landscape issues are considered in this respect.	Needs to be reworded
Negative Features 280a	<p>'Erosion of Architectural Detail'</p> <p>There is a difference between a lack of architectural detail in the first place and a subsequent erosion of architectural detail, which could be explained further.</p>	Further explanation needed
b	'This same guide has equal relevance to the remainder of the Parish'.	Remove this sentence

	The Conservation Character Appraisal only applies to the Conservation Area.	
d	It is not expected that new developments should correspond exactly with historic developments given both national and local planning policy and the differing times that such developments were built. But agree they should respect the context.	
e	<p>'Car Parking space in rural environments should be greater than the statutory minimum'</p> <p>This will be determined through the Local Plan on a district wide basis.</p>	
u	<p>You can use the term limit overhead wiring on utility poles, but this may be needed in some cases.</p> <p>Again, this is not necessarily a negative feature but a recommendation.</p>	
x	Are these historic features rather than landmarks?	Consider re-phrasing
	<p>Some of this list strays from being negative features to providing solutions to the problems e.g. e which states that more parking is needed when the negative feature is actually the congested on street parking. Restrict the list to just the negative features found. See the Hailsham Character Appraisal here, page 24</p> <p>Some of the points listed do not relate directly to character e.g. q, r, s</p>	<p>Restrict the list to just the negative features found.</p> <p>Move the proposed suggestions for improvements to a separate section.</p>